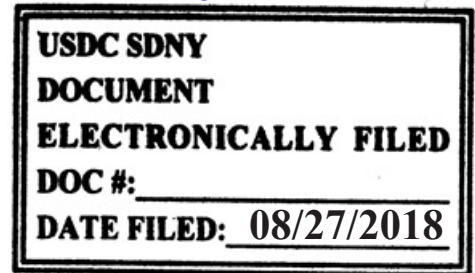


BLANKROME

The Chrysler Building
405 Lexington Avenue | New York, NY 10174-0208
blankrome.com

Phone: (212) 885-5148
Fax: (917) 591-7897
Email: dskakel@blankrome.com

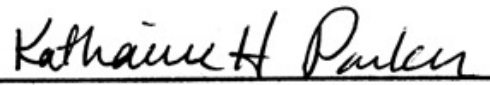


August 24, 2018

VIA ECF

The Honorable Katharine H. Parker
United States Magistrate Judge
United States District Court – S.D.N.Y.
500 Pearl Street, Room 750
New York, New York 10007

APPLICATION GRANTED


Hon. Katharine H. Parker, U.S.M.J.
08/27/2018

**Re: *City of Almaty, Kazakhstan, et ano. v. Mukhtar Ablyazov, et al.*,
No. 15-CV-5345 (AJN)(KHP)**

Dear Judge Parker:

We represent Triadou SPV S.A. (“Triadou”) and submit this letter-request to extend the expert discovery deadline from October 31, 2018 (per the Court’s May 10, 2018 Order, (ECF 649)), to December 31, 2018. Triadou has conferred with counsel for the Khrapunovs and counsel for Almaty/BTA, and neither objects to this request. Triadou’s request is the first to seek extension of the expert discovery deadline.

Triadou seeks this sixty-day extension because of scheduling issues that have already arisen with regard to counsel and experts. The limited expert discovery period also is likely to be complicated (and interrupted) by the depositions of Frank Monstrey and Mukhtar Ablyazov, which are expected to occur in September 2018. While Triadou has been working diligently to prepare for the next phase of the case, due to these scheduling concerns, it is unlikely that the parties can fully and properly conduct expert discovery in the current timeframe.

Accordingly, Triadou respectfully requests that the Court extend the current expert discovery deadline from October 31, 2018 to December 31, 2018.

Respectfully submitted,

s/ Deborah A. Skakel
Deborah A. Skakel